

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SECOND AMENDMENT ARMS (a d/b/a of	)	
R. Joseph Franzese), R. JOSEPH FRANZESE,	)	
individually and d/b/a SECOND AMENDMENT	)	Case No: 1:10-CV-4257
ARMS, and TONY KOLE,	)	
	)	
Plaintiffs,	)	
	)	Hon. Robert M. Dow, Jr.
v.	)	U.S. District Court Judge
	)	
CITY OF CHICAGO, a municipal corporation,	)	
RAHM EMANUEL, in his official capacity as	)	
Mayor of the City of Chicago, GARRY	)	Hon. Sheila M. Finnegan
McCARTHY, Superintendent of Police of the City	)	U.S. Magistrate Judge
of Chicago, and SUSANA MENDOZA, City Clerk	)	
of the City of Chicago,	)	
	)	
Defendants.	)	

## **AGREED MOTION FOR A CONFIDENTIALITY ORDER**

Plaintiffs, SECOND AMENDMENT ARMS (a d/b/a of R. Joseph Franzese), R. JOSEPH FRANZESE, individually and d/b/a SECOND AMENDMENT ARMS, and TONY KOLE, by and through LAW FIRM OF DAVID G. SIGALE, P.C., move that this Court enter a protective order in the form attached as Exhibit "A." In support thereof, Plaintiffs state as follows:

1. Plaintiffs' discovery responses in this case will likely involve confidential, proprietary, and trade secret information, as well as potentially personal financial information of nonparty individuals.

2. Plaintiffs' counsel has conferred with Defendants' counsel, and the parties have agreed on the entry of the proposed Confidentiality Order attached to this motion as Exhibit "A." The parties' proposed Confidentiality Order is based on the Court's model confidentiality

order. The proposed Confidentiality Order is also being e-mailed to the Court's designated e-mail address for proposed orders.

WHEREFORE, the Plaintiffs, SECOND AMENDMENT ARMS (a d/b/a of R. Joseph Franzese), R. JOSEPH FRANZESE, individually and d/b/a SECOND AMENDMENT ARMS, and TONY KOLE, respectfully request that this Court grant this Motion, enter the attached Confidentiality Order, and grant such other and further relief as this Court deems just and proper.

Dated: September 13, 2016

Respectfully submitted,

/s/ David G. Sigale  
Attorney for Plaintiffs

David G. Sigale (Atty. ID# 6238103)  
LAW FIRM OF DAVID G. SIGALE, P.C.  
799 Roosevelt Road, Suite 207  
Glen Ellyn, IL 60137  
630.452.4547  
[dsigale@sigalelaw.com](mailto:dsigale@sigalelaw.com)